

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**WILLIAM JOSEPH WEBB JR.,
PLAINTIFF,**

CIV. ACT. NO. : 07-31-GMS

V.

**FIRST CORRECTIONAL MEDICAL,
ET. AL.,
DEFENDANTS.**

JURY TRIAL REQUESTED

REQUEST FOR PRODUCTION OF DOCUMENTS, ETC....

(Pursuant to Rule 34 Fed.R.ofCiv. Proc.)

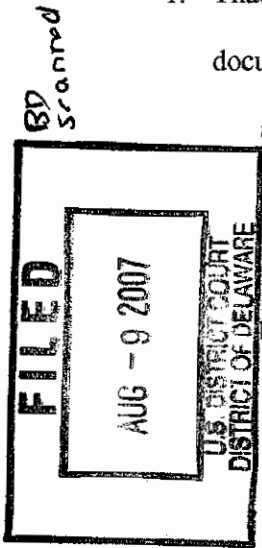
Plaintiff, William Joseph Webb Jr. requests that Defendants Gov. Ruth Ann Minner, Stanley W.

Taylor, CMS, Dr. Niaz, and Gina Wolken to respond within 60 days to the following requests:

Governor Ruth Ann Minner:

1. That defendant produce and permit Plaintiff to inspect and to copy each of the following documents:

- a. A complete copy of all documents, laws, and statements that you plan to use as evidence to support your defenses and/or at trial.(Make sure that any statements are made under oath.)
- b. A complete list of expert witnesses that you plan to use including their qualifications, educational status, employment status, along with whether or not they have ever been sued and/or internally written up by anybody and/or ever investigated for any reason(s).
- c. A complete copy of all documents that you have signed for the operation of the D.O.C. (Delaware Department of Corrections) including the budget(s).
- d. A complete list of expert witnesses that you plan to use including their qualifications, educational status, employment status, along with whether or not they have ever been



sued and/or internally written up by anybody and/or ever investigated for any reason(s).

- e. A complete copy of the banking accounts with information that your paycheck is drawn from.
- f. A complete copy of all communications that you have ever received from the Plaintiff.
- g. A complete copy of all media based coverage/articles (this includes newspaper articles, magazines, and t.v. news transcripts) in regards to the treatment of inmates within the last 10 years.
- h. A complete copy of any and all civil complaints filed against you within the last 10 years to include all discovery and disposition(s)/final order(s).
- i. A complete copy of the agreement(s) signed between the State of Delaware and the Federal Department of Justice about medical and prison conditions.
- j. A complete copy of your work history.
- k. A complete copy of your criminal history within the past 10 years.
- l. A complete copy of any communications received from your codefendants in regards to this litigation.
- m. A complete copy of all documentation of your Staff that is authorized to open your mail with the procedures, names, qualifications, educational status, employment status, and have they ever been sued, been written up internally or externally, also been under any type of investigation(s).
- n. A complete copy of all documents in your possession that may be directly or indirectly relevant to this litigation.

Stanley W. Taylor:

1. That defendant produce and permit Plaintiff to inspect and to copy each of the following documents:

- a. A complete copy of all documents, laws, and statements that you plan to use as evidence to support your defenses and/or at trial. (Make sure that any statements are made under oath.)
- b. A complete list of expert witnesses that you plan to use including their qualifications, educational status, employment status, along with whether or not they have ever been sued and/or internally written up by anybody and/or ever investigated for any reason(s).
- c. A complete list of expert witnesses that you plan to use including their qualifications, educational status, employment status, along with whether or not they have ever been sued and/or internally written up by anybody and/or ever investigated for any reason(s).
- d. A complete copy of any and all civil complaints, along with any internal or external write ups filed against you within the last 10 years to include all depositions, discovery, and disposition(s)/final order(s).
- e. A complete copy of the contracts signed between the Delaware Department of Corrections and First Correctional Medical.
- f. A complete copy of the contracts signed between the Delaware Department of Corrections and Correctional Medical Services.
- g. A complete list of nurses and doctors that have been allowed on D.C.C.'s property between the years of 2005 and 2007 to include their name, employment status, color pictures, and exactly what medical health care provider they worked for and the list of the doctors on call in case of an emergency.
- h. A complete copy of your work history.
- i. A complete copy of all documents in your possession that may be directly or indirectly relevant to this litigation.

- j. A complete copy of all grievances, appeals of grievances, etc... (with documentary evidence used to determine the outcome) filed by Plaintiff William Joseph Webb Jr. #256056.
- k. A complete copy of Plaintiff William Joseph Webb Jr.'s #256056 write-up history with complete documentation including appeals, preliminary reports, etc... and evidence to support such.
- l. A complete copy of Plaintiff William Joseph Webb Jr.'s #256056 classifications during his entire incarceration on this sentence to include appeals and documentary evidence to support the classification at all given/relevant times.
- m. A complete copy of your criminal history within the past 10 years.
- n. A complete copy of the banking accounts with information that your paycheck is drawn from to include the name on the account, bank name and address, etc...

CMS:

- 1. That defendant produce and permit Plaintiff to inspect and to copy each of the following documents:
 - a. Plaintiff's complete medical file.
 - b. Plaintiff's filed grievances and appeals with complete investigations and any notes/evidence .
 - c. A complete copy of all the contracts ever entered between CMS and Delaware Department of Corrections.
 - d. A complete copy of all evidence and statements you are preparing to enter into evidence to support your defenses/at trial.(Make sure that any statements are made under oath.)
 - e. A complete copy of all protocols and standard operating procedures while CMS is employed by Delaware Department of Corrections.

- f. A complete list of expert witnesses that you plan to use including their qualifications, educational status, employment status, along with whether or not they have ever been sued and/or internally written up by anybody and/or ever investigated for any reason(s).
- g. All civil suits filed against CMS within the last 10 years with all complaints, discovery, and dispositions/final orders against same.
- h. All documents associated with Dr. Niaz's employment with CMS including pay and any contracts, any complaints internal or external.
- i. All documents associated with Gina Wolken's employment with CMS including pay and contracts, any complaints internal or external.
- j. The hiring practices that allows CMS hire the same employees of terminated medical health care providers by the Delaware Department of Corrections.
- k. All relevant information in CMS' possession that is relevant to this litigation.
- l. Any contact whether by mail, email, etc... that CMS has or may have received by any codefendants.
- m. A complete copy of all tests performed by outside contractors on Plaintiff with costs, results, chain of custody, contracts, qualifications, along with whether or not they have ever been sued and/or internally written up by anybody and/or ever investigated for any reason(s).
- n. A complete copy of insurance information/policies.

Dr. Niaz:

- 1. That defendant produce and permit Plaintiff to inspect and to copy each of the following documents:
 - a. A complete documentation of educational achievements.

- b. A complete documentation of employment history to include all status information and private practice information.
- c. A complete copy of all evidence and statements you are preparing to enter into evidence to support your defenses/at trial.(Make sure that any statements are made under oath.)
- d. A complete copy of any and all civil complaints, along with any internal or external write ups filed against you within the last 10 years to include all complaints, depositions, discovery, and disposition(s)/final order(s).
- e. A complete copy of insurance information/policies.
- f. A complete list of nurses that worked with you while you were or are employed to work at the Delaware Department of Corrections' facilities to include their names, qualifications, educational status, and whether or not they have been sued, written up internally or externally with the complaint(s), discovery, and disposition(s)/final order(s).
- g. A complete copy of your criminal history for the past 10 years.

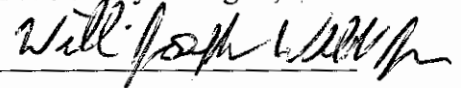
Ms. Gina Wolken:

- 1. That defendant produce and permit Plaintiff to inspect and to copy each of the following documents:
 - a. A complete copy of your educational history.
 - b. A complete copy of your work history.
 - c. A complete copy of all evidence and statements you are preparing to enter into evidence to support your defenses/at trial.(Make sure that any statements are made under oath.)

- d. A complete copy of any and all civil complaints, along with any internal or external write ups filed against you within the last 10 years to include all complaints, depositions, discovery, and disposition(s)/final order(s).
- e. Any and all information relevant to this litigation.
- f. Any communications that you received from any of your codefendants.

Any failure to supply the following documents will result in a default judgment against you along with a request for sanctions.

Submitted this 7th day of August, 2007.



William Joseph Webb Jr.
#256056 / D/E F17T
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, William J. Webb Jr. hereby certify that I have served a true and correct cop(ies) of the attached Request for Discovery Upon the following parties/persons:

To: Eileen Kelly

820 North French Street

Wilmington, DE 19801

To: Patrick G. Rock

913 Market Street, Ste. 800

Wilmington, DE 19801

To: First Correctional Medical

205 W. Giaconda Way, Ste. 115

Tucson, AZ 85704

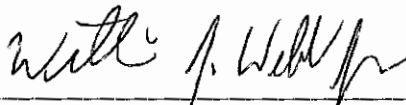
To: Dr. Ali

1181 Paddock Road

Smyrna, DE 19977

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 7 day of August, 2007



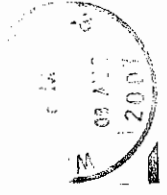
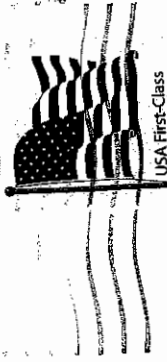
William J. Webb Jr. #256056

I/M William Joseph Webb Jr.
SBI# 256056 UNIT DE F17

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



Clerk of the U.S. Dist Ct
844 ~~844~~ N. King Street
Lockbox 18
Wilmington, DE
19801